


de maximis, inc.

186 Center Street
Suite 290
Clinton, NJ 08809
(908) 735-9315
(908) 735-2132 FAX

October 11, 2005

Mr. Joseph Cosentino
United States Environmental Protection Agency
2890 Woodbridge Avenue, Bldg. 209, Mail Stop 211
Edison, New Jersey 08837

VIA FAX AND U.S. MAIL

**RE: Bayonne Barrel & Drum Site, Newark, NJ
Progress Report No. 20**

Dear Mr. Cosentino:

On behalf of the Bayonne Barrel & Participating Parties and pursuant to Paragraph 23 of the Administrative Order on Consent, enclosed please find three (3) copies of Progress Report No. 20 covering the period from September 1, 2005 through September 30, 2005.

Very truly yours,

de maximis, inc.


William J. Lee

cc: S. Flanagan, USEPA
S. Kehayes, NJDEP
J. Jones, City of Newark
A. Saling, Kirkpatrick & Lockhart
W. Hyatt, Kirkpatrick & Lockhart
D. Reid-Green, BASF
J. Vidumsky, DuPont

427177



PR.20/slr

Allentown, PA • Clinton, NJ • Danville, IN • Knoxville, TN • Livonia, MI • Riverside, CA
St. Charles, IL • Sarasota, FL • Jacksonville, FL • Houston, TX • Simsbury, CT • Waltham, MA



**BAYONNE BARREL & DRUM SUPERFUND SITE
PROGRESS REPORT NO. 20
September 1, 2005 through September 30, 2005**

Description of the Actions Taken Toward Achieving Compliance with the Administrative Order on Consent Since the Previous Report:

- A meeting was held on September 12, 2005 at EPA's Region 2 office in New York to discuss remedy selection. The meeting was attended by representatives from the Bayonne Barrel Participating Parties, EPA and NJDEP. The Participating Parties presented an updated proposal for remediation at the site to include removal of Principle Threat level PCBs in addition to the capping and containment measures that will be deployed as part of the future redevelopment of the site. The agencies indicated that more details are needed for any final determination, including review of a risk assessment as well as information about costs, but that such an approach represents a reasonable remedy for the site.
- EPA conditionally approved the Work Plans and Site Specific Health and Safety Plan for loading and off-site disposal of the rubbery residue and waste ash piles. Site setup activities commenced on September 19, 2005 and load-out was completed on September 27, 2005. Approximately 635 tons were transported to Clean Harbors' Deer Park facility in 34 intermodal containers. Containers were loaded on-site and transported to a nearby rail yard for rail transportation to Deer Park, Texas.
- Site security continues to be maintained at the site with guard service and video surveillance.
- A meeting was held on September 27, 2005 in Newark, NJ to discuss NJDEP's comments (August 2005) to the Remedial Investigation Report (January 2005). The meeting was attended by the Participating Parties, EPA and NJDEP. NJDEP's comments mostly pertained to (1) completing delineation of on-site contaminants to off-site locations; (2) mapping and studies of the site's storm sewers, and; (3) suggestions for completing the groundwater investigation through modeling and subsequent monitoring. Work Plans are to be submitted for NJDEP approval prior to proceeding with this work.

**Mr. Joseph Cosentino
Bayonne Barrel & Drum Superfund Site
Progress Report No. 20
October 11, 2005**

Summary of all Results of Sampling, Tests or Other Data Received or Generated Since the Previous Report:

None.

Completed Deliverables Since the Previous Report:

None.

Actions Planned Prior to Submittal of Final Completion Report:

- Prepare documentation of all site disposal activities.
- Continue Monthly Progress Reporting.

Percentage Completion:

Work Plan Submittal and Approval- 100%
Construction Operations Plan Implementation - 95%
Post-Removal Site Control Plan - 0%
Final Report - 0%

Delays Encountered or Anticipated:

None currently identified.